

Table of June 2007 SWMP Analysis and Required Revisions

Acronyms:

BMP	- Best Management Practice
MG	- Measurable Goal
SWMP	- Storm Water Management Plan
SWPPP	- Storm Water Pollution Prevention Plan

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1	Introduction	Specific work items	Missing a description to the reader that the tables contain the specifics, while the text provides detailed background and context for BMP. Additionally, the tables are the equivalent of the Work Plan which is required by the Permit (per City Attorney's statement to this effect at 2007 Water Board public meeting)		Add wording to the effect that, "specific work items and goals are included in the tables in each section. BMPs will implement provisions described in the text. The text is provided for background, intent, and/or additional information as needed on chosen BMPs and programs."
2	Applies to all sections of the SWMP	Due dates for BMPs	1. Many of the BMPs do not have time frames indicating which year they will be completed. Some BMPs have due dates that reference "Year 'X' ", but this needs to be defined in relation to actual years.		1. The City must include an easy-to-locate description of when BMPs will be fully implemented. This may be accomplished by adding a Timeline column to each BMP table in the Elements, with a corresponding due date given with each BMP, or by providing a blanket statement such as, "All BMPs contained in this

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			2. The SWMP is intended to cover the 5-year permit term. The SWMP tables are intended to be the City's Work Plan for the upcoming year (per City Attorney's statement to this effect at 2007 Water Board public meeting).		document will be fully implemented by February 2010 (end of 2 nd permit term), unless otherwise explicitly stated. "Year one" of the due dates is considered to be February 2005 – February 2006", or other method. 2. The City must add a statement or BMP stating that they will submit updated tables each year with the Annual Report. The tables will serve as the City's Work Plan. Any changes to the current tables will be prominently marked on the newly-submitted table.
3	BMP 3.1,	Stenciling, signage of Drainage inlets	MGs have no measurable quantity		Adopt measurable quantities with an equivalent level of specificity as the example BMP in footnote 1.
4	BMP 3.5	Drainage inlet hot spots	Refers to schedule in BMP 3.4. No schedule given	Repair schedule in Annual Work Plan (which year?)	All documents referenced in the SWMP must be posted to the City website, and the full web address provided in the SWMP at the place of document reference, or in a table of references for the entire SWMP. If electronic posting is not possible or not practicable, then documents must be available for public review and the method and location for public viewing must be described in the SWMP.
5	BMP 3.2, 3.3			Municipal Maintenance: Inventory and Map Plan	All documents referenced in the SWMP must be posted to the City website, and the full web address provided in the SWMP at the place of document reference, or in a table of references for the entire SWMP. If electronic posting is not possible or not practicable, then documents must

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					be available for public review and the method and location for public viewing must be described in the SWMP.
6	BMP 3.12	Typographic error	Wording in Implementation Plan should read, "...scheduled as part of regular maintenance/repair..."		Correct typographic error
7	BMP 3.12b	Inspect City-owned properties for SWMP and NPDES compliance	Document in "report"		Should specify reporting in the Stormwater Annual Report
8	BMP 3.14	Municipal maintenance and repair schedules	<ol style="list-style-type: none"> 1. references SWPPPs which are not readily available 2. criteria are based on safety, not water quality 	SWPPPs and field observations	<ol style="list-style-type: none"> 1. All cross-referenced documents must be included in the SWMP, or posted to the City website and the full web address provided in the SWMP at each document reference location in the SWMP. If electronic posting is not possible or not practicable, then documents must be available for public review and the method and location for public viewing must be described in the SWMP. 2. Implementation Plan section of the Table must be revised to include <u>water quality</u> as a criterion for repairs and improvements. 3. Observation schedules must include quarterly observations at a minimum.
9	BMP 3.17	mulch	No measurable goal of % parks, acreage, or other quantitative goal given that the City will mulch.		Provide a measurable goal for mulch use.
10	Pg. 3-19	Pesticide/herbicide	1. Poor description of PHAER	Pesticide	1. Provide reference where reader can learn

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		e	<p>concept that is referred to like a program.</p> <p>2. Page 3-19, last sentence limits City's commitment to PHAER. Vague description of what the City will commit to do.</p>	Hazard and Exposure Reduction (PHAER) Zone concept	<p>more about PHAER program</p> <p>2. City should clarify what portion of PHAER they are going to do and why only a portion of the program, and then can remove sentence, page. 3-19, "Resource limitations will limit the City's ability to implement all of the concepts contained within PHAER"</p> <p>3. The City may replace the PHAER wording with a BMP that meets the intent of minimizing pesticide use, but which is more specific than the current language.</p>
11	BMP 3.19	Herbicide	No Measurable Goal provided		Provide a quantitative measurable goal, for example: 75% herbicide use reduction by 2009 from 2005 use-levels.
12	BMP 3.21	Tree planting list	<p>No measurable goal of % parks or acreage that will use low-pesticide/LID-compatible trees, or other quantitative goal given</p> <p>Unclear whether the goal is that all development will use only listed trees</p>		Provide a measurable goal for LID-compatible tree plantings.
13	BMP 3.29	Landscape chemicals	No goal of reduced pesticide usage. Pesticide reduction is needed based on CCAMP findings of high pesticide in receiving waters.		Include quantitative measurable goal related to this BMP.
14	BMP 3.33	Typographic error	Best Management Practice should read, "...where run- off "		Correct typographic error

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			may degrade water quality.” Implementation Plan should read, “...immediately water-in to prevent downstream pollution or <i>plant</i> burn.”		
15	BMP 3.35		All cross-referenced documents must be included in the SWMP, or posted to the City website and the full web address provided in the SWMP at each document reference location in the SWMP	“Watershed management” training. Film, <i>After the Storm</i> . Field maintenance manuals.	All cross-referenced documents must be included in the SWMP, or posted to the City website and the full web address provided in the SWMP at each document reference location in the SWMP. If electronic posting is not possible or not practicable, then documents must be available for public review and the method and location for public viewing must be described in the SWMP.
16	BMP 3.41	Landscape and building maintenance BMPs	Meas. Goal reads, “...emphasis on reducing environmental/personal injury...” Should read environmental <i>and</i> personal injury to fit with purpose of SWMP. If the “/” means “and/or”, then the City can use personal injury training as credit for stormwater protection training, which is not in keeping with the intent of the program and permit.		Change BMP to: “...emphasis on reducing environmental injury...”
17	BMP 3.49	Storm drain stenciling	What is measurable goal after June 2007?		Adopt measurable quantities with an equivalent level of specificity as the example BMP in footnote 1.
18	Page 4-17	City’s Storm Water Master	All cross-referenced documents must be included	City’s Storm Water Master	All cross-referenced documents must be included in the SWMP, or posted to the City website and

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		Plan	in the SWMP, or posted to the City website and the full web address provided in the SWMP at each document reference location in the SWMP	Plan	the full web address provided in the SWMP at each document reference location in the SWMP. If electronic posting is not possible or not practicable, then documents must be available for public review and the method and location for public viewing must be described in the SWMP.
19	Sections C, f, g, H, and J beginning on page 4-10	Updating City's Zoning Code, Grading Standards, Storm Water Ordinance, Storm Water Master Plan, and City's Standard Specification Document,	SWMP discusses Kennedy/Jenks review of existing documents as if it is a future event. The consultant released its comments in Technical Memorandum No. 1 (Tech Memo) on Dec. 31, 2006. This information should have been incorporated into this SWMP version, or into Ordinances, Codes, and Standards referenced in the Tech Memo.		<p>1. Re-word sections to explain that the consultant has already reviewed and commented on the relevant documents.</p> <p>2. Include Tech Memo as appendix or place on-line and include web address.</p> <p>3. City must address contents of the Tech Memo in the SWMP. If the City does not follow the consultant's suggested methods of meeting Permit requirements, then the City must explain their preferred alternative method of meeting requirements. If taking action, tell when and how. Specifically address each sub-section in Tech Memo section 4.2, pages 10 – 15.</p>
20	Pg. 4-12, first paragraph	Development Design Standards			First sentence should read, "A Development Design Standards Plan for LID implementation in new and re-development ..."
21	Pg. 4-24 "will be considered BMPs" wording in item #1, last sentence, and item #2, first sentence and		What does this wording mean? Does it mean that these items are required? If these items are BMPs, they should have associated Measurable Goals		When using wording equal or similar to "will be considered BMPs", the City must add to the SWMP a directive that such BMPs must be followed unless the applicant has clearly demonstrated and documented that such BMP is ineffective or overly burdensome. In these cases, the City must retain documentation and

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	other places				provide compliance levels for such BMPs in the City's Stormwater Annual reports
22	Pg. 5-2 and 5-4	Element 5 "three principle Goals" , and Construction Objectives	Pg. 5-2, Section 5.2, paragraph 2 - First goal is to develop performance standards and put them into daily practice. Third goal paraphrased says the goal is to ensure program effectiveness. How will the City determine whether the actions it is taking are effective in improving stormwater runoff? The Annual Report discussion on effectiveness should answer this, and the SWMP should provide a way to determine effectiveness. For example, how can the city track whether the brochures, training, and enforcement are resulting in the City meeting the Construction Objectives?		Insert BMPs that measure effectiveness. To do this, the City must include a BMP to track and report patterns or trends in site compliance, or varying degrees of compliance, and analyze the effectiveness of BMPs in Element 5.
23	BMP 6.10	Include quasi-governmental agencies	No goal given for creating joint programs with schools		Add Measurable Goal which includes a quantifiable <u>goal</u> , not just reporting the "number of events and/or number of students involved." Adopt measurable quantities with an equivalent level of specificity as the example BMP in footnote 1.

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24	BMP 6.13	Storm drain stenciling and signs	1. Measurable goal doesn't discuss stenciling 2. Measurable goal doesn't give specific number or percentage of drains stenciled.		Adopt measurable quantities with an equivalent level of specificity as the example BMP in footnote 1.
25	BMP 6.11	Homeowner automobile washing	Permit also requires City to outreach to residential auto repair, washing. Where is that contained in SWMP? Our basis for concern are the identified Pollutants of Concern, and Permit requirements		Add to Salinas BMP 6.14, "Subjects will include auto repair, auto washing, fertilizer, pesticide and herbicide management, and pet waste disposal."
26	BMP 6.14	Media outreach	How will City choose most effective advertising media?		Add wording similar to: "Arbitron program will be used to determine market share of each radio station and TV. Arbitron looks at time slots as well as public use." (The basis for requirement is City staff's verbal statement that this is how the City will determine where to effectively advertise.)
27	BMP 6.15b	Teacher training	Not measurable goal. Measurable goal for 6.15b was removed		Add M.G. with equivalent detail as the following example: "In the first year, 10% of teaching staff, representing 25% of all schools in the district will attend. Second year goal is to reach 10% of teaching staff from a new set of 25% of all schools."
28	BMP 6.17 on page 6-24	Public awareness survey	1. If comparing yr. 2 survey against year 5 survey, why change location? Should try and hold variables constant to get better comparison. 2. Measurable goal does		Change BMP to the following, or an equivalent function: "Conduct comparable public awareness surveys. In years 2 and 4, conduct public awareness surveys as part of the Monterey County Fair. In years 3 and 5, conduct mail-out written surveys in conjunction with the local waste hauler BFI. Document and analyze results to determine if SWMP BMPs should be

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			not address how the City will use the survey information. 3. There is a BMP 6.17 on page 6-17 that differs from the BMP 6.17 on page 6-24.		modified.” Remove BMP 6.17 from the BMP 6.11 on page 6-17
29		BMP numbering in element 4, 5, and 7	Hard to reference BMPs for discussions/review		Number all BMPs matching the format used in Elements 3, 6, and 8
30	BMP “IV.d”, page 7-10	“Require BMPs for all industrial and high-risk commercial facilities.”		Stormwater Management Plan, Stormwater Ordinance and Grading Standards (Appendix C of SWMP)	Cross reference the section in the Ordinance(s) that supports this BMP
31	Page 7-4, Section B		Typo in reference in Section B, 3 rd paragraph		Section B, 3 rd paragraph should read, “...during an inspection described in Section 7.4.a ...”
32	Page 7-4, Section C		All cross-referenced documents must be included in the SWMP, or posted to the City website and the full web address provided in the SWMP at each document reference location in the SWMP	City’s Industrial Inspection Guidance Manual, 2000	All cross-referenced documents must be included in the SWMP, or posted to the City website and the full web address provided in the SWMP at each document reference location in the SWMP. If electronic posting is not possible or not practicable, then documents must be available for public review and the method and location for public viewing must be described in the SWMP.
33	BMP 7.8 Implementation Plan	BMP enforcement	Need to link the narrative to the BMP.		“Follow progressive enforcement procedure described in Element 7 narrative and contained within Element 10...”
34	BMP 7.9	Non-compliance	First sentence of 4 th paragraph		Sentence should read, “Determination of “non-

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	Implementation Plan		is confusing.		compliance” will be based upon a party’s not meeting the City’s Code of the written requirements, and/or the party’s failure to remedy the non-compliant condition.”
35	BMP 8.2 Implementation Plan	Spill response	Web address for Spill Response Plan is not complete	Salinas Spill Response Plan	Place full web address to Spill Response Plan in the BMP
36	BMP 8.4a and page 9-3		No concern. Reviewer is including this information for ease of reference.	QAPP – Quality Assurance Project Plan Link given on page 9-3	No changes needed. Reviewer is including this information for ease of reference.
37	BMP 8.6 Measurable Goal	Illicit discharge – used oil and toxic materials	No quantitative goals.		Add specifics on when SWSWA partnership will be developed, number of people that outreach will project to reach, and who target audiences are.
38	BMP 8.7 Measurable Goal	Illicit discharge – used oil and toxic materials	Need effectiveness feedback analysis		Add BMP to analyze trends in illicit discharge activities and analyze whether enforcement mechanisms are effective.
39	Page 10-2, and Page 4-17, Sections F and G	References Stormwater Ordinance and Standards to Control Excavations, Cuts, Fills, Clearing, Grading, Erosion and Sediment (2007) (Grading Standards	City did not address RWQCB comments in ordinance.		1. Add BMP in Element 4 or 5 that requires riparian zone protection with wording the same as, or equivalent in function to the wording in footnote 2 of this table.
40	Applies to all	Permit requires			1. Add BMP that: a) the City will create and

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	sections	City to measure program effectiveness. This requirement is especially critical, and must be addressed, due to water quality issues stemming from industrial sites, and the City's 2004 storm water audit that identified a lack of overall program internal analysis and effectiveness check.			<p>maintain a list of identified sources of water quality data collected in the City from data currently submitted to the RWQCB as required by other parties' WDR and NPDES permits, Central Coast Ambient Monitoring Data, organized citizen monitoring efforts, and other water sampling if available; and b) The identified data sources will be analyzed as needed to improve characterization of water quality problems when they arise.</p> <p>2. Add to each Element, or include overarching BMP(s) that tracks trends and patterns in actions or outcomes related to the Element(s). Add a BMP to report this information in the annual Report.</p>
41	Appendix C	Ordinance Amending Chapter 29 of the Salinas City Code Regarding Stormwater Management and Discharge Control	Presented as Final, however does not have final signatures		<p>Replace with the adopted version containing final signatures of mayor and city clerk.</p> <p>Update wording on Page 10-2, section 10.3, 2nd paragraph to indicate final ordinances are included in SWMP.</p>
42	Appendix C	Standards to control excavations, cuts fills, clearing, grading, erosion and sediment	Presented as Final, however version does not match adopted Final For example, see Ref. No. 42.		Replace with the adopted version, with final signatures of mayor and city clerk

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		(Grading Ordinance)			
43	Applies to all sections of the SWMP	Public notice and public input	The California Water Code requires, and the RWQCB Board (in response to written and verbal public comments) has directed the City to ensure the public has ample opportunity for review and comment on storm water related issues. These issues include, but are not limited to, the SWMP, design standards, ordinances.		SWMP Element 6 must include a BMP that requires the following: Thirty (30) day or more public notice and opportunity for public comment for stormwater-related documents prepared for City Council adoption. Stormwater-related documents include, but are not limited to, SWMP revisions, Design Standards, grading and stormwater ordinances, design or development standards affecting stormwater runoff or creek or riparian zones. Substantive public comments must be addressed in a timely manner by City staff in a written format.

¹ Example Measurable Goals for Stenciling and Signage BMP: a) 100% of storm drain inlets in corporate yard stenciled by end of Year 1 and any new inlets which may be created stenciled immediately after being built. Stenciling redone in Year 5. b) Provide stenciling equipment, supplies, and maps of inlets to be stenciled, and complete a minimum of 300 drains and tabulate areas stenciled. Percent of all entities completed per year will be approximately 5-10%.

² BMP for Stream, Creek, Riparian Zones, and Drainage Course Protection.

1. Applicability. The section shall apply to all streams, creeks, riparian zones, and drainage courses

a) Development, including clearing, compaction, excavation, construction of buildings, fences and walls, shall be setback from the top of bank or edge of riparian habitat, whichever is farther from the creek flow line. Minimum Development Setbacks for Streams, Creeks, Riparian Zones, and Drainage Courses is as follows:

i) Santa Rita Creek, Natividad Creek, Gabilan Creek, and Alisal Creek (Reclamation Ditch): a minimum setback of 35 feet. Exceptions may be made through application of a conditional use permit and based upon consideration of recommendations from a Phase I Archeological Study; a biology report; and a hydrogeomorphology report, the setback may provide for an average of 35 feet within a proposed project area but under no circumstance shall any portion be less than 25 feet.

ii) All other Creeks and Drainage Ways: a minimum setback of 25 feet.

2. Fences and other structures such as culverts, walls and bridges which must be constructed within the floodway shall be designed in accordance with all applicable best management practices so as to prevent an obstruction or diversion of flood and drainage flow and to minimize adverse effects to natural riparian habitat. Fences may be permitted in the Development setback if designed to allow for wildlife passage and the unimpeded flow of water.
3. Clearing of significant vegetation canopy cover or herbaceous ground cover; removal of any native plant species within the riparian area is prohibited within the Setback area. A tree permit may be requested for trees potentially affecting public safety.
4. Existing agricultural operations are exempt from creek setback standards established herein.
5. Exceptions to the requirements established in this section can be made only upon a finding that its application would violate federal and state law.